IN THE UNITED STATES ARMY
FIRST JUDICIAL CIRCUIT

U N I T E D S T A T E S	)	
	)	
v.	)	**DEFENSE INTERROGATORIES**
	)	**FOR JOHN DOE WITNESS**
MANNING, Bradley E., PFC	)	
U.S. Army, (b) (6) [redacted]	)	
Headquarters and Headquarters Company, U.S.	)	
Army Garrison, Joint Base Myer-Henderson Hall,	)	DATED: 14 April 2013
Fort Myer, VA 22211	)	

Pursuant to Rule for Courts-Martial (R.C.M.) 702(g)(2), the Defense submits the following questions to be asked of each of the John Doe witness. The Defense requests that the responses to the written interrogatories be provided to the Court and Defense no later than 6 May 2013.

Memory Issues

1) Please describe the nature of your memory issues?

2) When did you start having memory issues?

3) How did you realize that you were having memory issues?

4) What was the cause of your memory issues?

5) How do your memory issues impact you?

6) Are you taking any medication for your memory issues? If yes, what medication(s) and for how long?

7) Were you taking any medication on the date of the UBL raid (2 May 2011)? If yes, what medication(s) and for how long?

8) Do your memory issues impact your ability to accurately recall the events of the UBL raid? If yes, how so?

9) Is there anything else that may impact your ability to accurately recall the events of the UBL raid? If yes, please explain in detail.

UBL Raid

1) When you entered the UBL compound, what was your assigned task?

2) How long were you on the ground at the UBL compound?

3) How much time transpired from the moment your team entered the compound to the time that you killed UBL?

4) According to open source reporting, the entire raid lasted 38 minutes. At what point during the mission, did you shift your focus from capturing or killing UBL to data recovery such as computers, hard drives, thumb drives, and electronic equipment?

5) How much time did you have to find and secure the electronic data before leaving the UBL compound?

6) Where were the items that you found located?

7) Please describe the room (or rooms) in greater detail, specifically the nature of the computer equipment in the room (or rooms).

8) Did the room (or rooms) appear to be being used as a nerve center or a command and control post?

9) Were you the first person in the room (or rooms)? If no, who was?

10) Were you the only one securing computer information in the room (or rooms)? If no, who else was securing information?

11) If there were others securing information from the same room (rooms), how many individuals were there?

12) How much electronic media and documents did the other individuals take?

13) What computer information did you take from the room (or rooms)?

14) What computer information did you not take from the room (or rooms)?

15) Did you make any notes about the electronic media and documents taken during the raid?

16) Please detail your decision process as to what you elected to take and what you elected not to take from the room (or rooms).

17) How much time did you spend collecting electronic and documentary information?

18) Were digital forensic and evidence recovery specialists part of the raid team? If yes, how many members?

19) Were you trained to be a digital forensic and evidence recovery specialist? If yes, what was your training?

20) How many members of the team were collecting electronic and documentary information from the compound?

21) According to open source reports, your team found approximately 100 thumb drives and computer disks, along with 10 computer hard drives and five computers in the UBL compound. Is this accurate? If yes, how much of this information did you take from the compound? If no, how many thumb drives, computer disks, computer hard drives and computers did your team take?

22) The published open source reports also indicate that your team found between 10,000 and 15,000 documents in the UBL compound. Is this accurate? If yes, how much of this information did you take from the compound? If no, how many documents did you take from the UBL compound?

23) The published open source reports also indicate that your team found between 15,000 and 25,000 videos in the UBL compound. Is this accurate? If yes, how much of this information did you take from the compound? If no, how many videos did you take from the UBL compound?

24) Did your team take the time during the raid to make any physical Radom Access Memory (RAM) snapshots of any of the computers? If yes, how many of the computers and how long did this take your team?

25) Did your team transmit any of this information via a very-small-aperture terminal (VSAT) from the compound? If yes, how much time did you spend doing this?

26) Other than the room (or rooms) where you recovered information, did any other member of the team find electronic media or documentary information in any other part of the compound? If yes, please explain where the information was found.

27) If information was found by other team members in a different location than where you searched, was this information seized? If yes, please explain to the best of your knowledge what was seized by indicating the type of electronic or documentary information and the amount that was seized.

28) How did you secure the information that you collected?

29) After securing the information, did you give it to anyone before you left the compound? If yes, who did you give it to?

30) Please detail how the information was removed from the compound.

31) Was the information place on only one of the helicopters from the UBL raid? If no, please detail the number of helicopters that information was placed onto and how much of the information was placed on each helicopter.

32) Did you make any notes about the electronic media or documents during the helicopter ride back to Bagram?

33) Did you sleep on the helicopter ride back to Bagram? If yes, how long were you asleep? If yes, where was the electronic media and documentary information while you were asleep?

34) Did you remain with the electronic media and documentary information at all times from the compound to when you returned to Bagram? If no, please explain.

35) Please detail how the electronic media and documentary information that you collected was handled once you returned to Bagram.

36) Did you receive a debriefing upon return to Bagram?

37) Did anything happen before the debriefing?

38) Did the debriefing occur before you transferred custody of the electronic media and documentary information to the FBI?

39) Where was the electronic media and documentary information during the debriefing?

40) If the electronic media and documentary information was not with you, who had physical control over the items?

41) If someone other than you had physical control over the electronic media and documentary information before releasing that information to the FBI, did that individual also have physical control over other electronic media and documentary information not associated with the UBL raid?

42) Where did you and the other members of your team place the electronic media and documentary information that you collected from the UBL compound when you were being debriefed?

43) Is it true that, you and the other members of your team threw all of your bags down that contained the electronic media and documentary information when you arrived at Bagram, went to another area to get debriefed, and then came back to retrieve the bags that contained the electronic media and documentary information? If yes, who watched the electronic media and documentary information while you and your team were being debriefed?

44) Was the electronic media and documentary information that you collected ever out of your possession or sight before releasing it to the FBI? If yes, why and for how long?

45) Was the electronic media and documentary information that you collected ever mingled with other information and evidence prior to being cataloged by the FBI? If yes, what was the other information and where was it from?

46) After releasing the information to the FBI, did you ever have any other involvement with the electronic media or documentary information that you collected?

DAVID EDWARD COOMBS
Civilian Defense Counsel